FILED

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS		EKK2 OLLIOT	
			7006 NOV 17 P 12: 48
			U.S. DISTRICT COURT DISTRICT OF MASS.
SHENIA DANCY-STEWA	RT as Administratrix)	Civil Action
of the Estate of EVELINE I	BARROS-CEPEDA,)	No. 05-11803MLW
Plair	ntiff)	
)	
v.)	
)	
THOMAS TAYLOR, Jr., as	nd the)	
CITY OF BOSTON)	
Defe	ndants)	
)	

PLAINTIFF'S AUTOMATIC DISCLOSURE TO THE DEFENDANTS UNDER LOCAL RULE 26.2(A) AND 26.1(B)

Pursuant to Local Rules 26.1(B) and 26.2(A), the Plaintiff makes the following

Automatic disclosures:

- A. Persons likely to have discoverable information that the plaintiff may use to support her claim or defenses unless solely for impeachment.
- 1. Domingas DePina and Gabriel Robaldo 75 Wayland Street Dorchester MA 02127

Domingas DePina is the decedent's mother and her child's grandmother. Gabriel Robaldo is Domingas DePina's live-in "boyfriend" and was living with her prior to and at the time of decedent's death. Domingas DePina obtained guardianship of her grandson and has been raising him since the decedent's death. She and Gabriel will testify relative to damages resulting from the decedent's death.

Carlos Cepeda was the decedent's husband at the time of her death and will testify relative to damages he has suffered as a result of her death.

B. Description of relevant documents

The plaintiff knows of no documents not already provided to the defendants that are relevant to any issue in this case. Plaintiff has a police incident report which

defendants have indicated they also have and a death certificate, a copy of which was annexed to the complaint. Plaintiff also has copies of te Boston Police Department policies and procedures regarding shooting at moving vehicles and an Boston Sunday Globe magazine article about Boston Police Officer Thomas Kennedy on training police officers when to shoot.

C. Insurance agreements

Not applicable.

D. Experts who may be called at trial.

The plaintiff has not yet decided who she will call to testify as expert witnesses at the trial and will supplement this response when the decision is made.

Respectfully submitted

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